



United States Department of the Interior


OFFICE OF THE SECRETARY


Washington, DC 20240

JUL 26 2019

MEMORANDUM

To: Bureau Human Capital Officers
Bureau Training Directors

From: Jennifer Ackerman 
Director, Office of Human Capital
Deputy Chief Human Capital Officer

Dr. Vicki A. Brown 
Chief Learning Officer

Subject: Department Policy on Mandatory Training

Efforts over the past year have significantly reduced the time employees' participate in Department level mandated training, while maintaining the integrity and effectiveness of such training to better support organization behavioral outcomes. The next step in optimizing the balance of mandatory training requirements and ensuring it is value added, rather than a distraction, to workplace environment and mission success is to implement a policy and vision on the administration of mandatory training.

The attached Personnel Bulletin 19-05, *Departmental Policy on Mandatory Training*, ensures a balance between effective training management and compliance as part of a robust learning ecosystem. The policy establishes the importance of a deliberate decision-making process that augments other organizational activities to foster continual learning, when implementing mandatory training.

The policy includes the following highlights:

- Establishes mandatory training approval to the Assistant Secretary level (delegable to Bureau Deputy Directors);
- Requires bureaus/offices to maintain transparency of mandatory training requirements;
- Establishes who executes assignment of mandatory training within DOI Talent;
- Requires bureaus to establish process to determine training reciprocity by September 15, 2019;
- Requires bureaus to evaluate current mandatory training requirements and report to Department Chief Learning Officer by September 30, 2019; and
- Establishes procedures for identifying and requesting mandatory training at the Department level.

Bureau Human Capital Officers may contact the Deputy Chief Human Capital Officer, Jennifer Ackerman, at Jennifer_ackerman@ios.doi.gov and bureau training directors may contact the Chief Learning Officer, Dr. Vicki Brown, at vicki_brown@ios.doi.gov for any questions.

cc: Assistant Secretaries
Bureau Directors
Bureau Deputy Directors



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PERSONNEL BULLETIN NO: 19-05

SUBJECT: Departmental Policy on Mandatory Training

- 1. Purpose.** This Personnel Bulletin (PB) establishes current Department of the Interior (DOI) policy on mandatory training and provides guidance for bureaus/offices to establish and manage their mandatory training programs.
- 2. Authorities.** 5 U.S.C. 4103; 5 C.F.R. 410; 5 C.F.R. 412; and Public Law 108-411, §201.
- 3. Policy.** The Department of the Interior (DOI) must ensure the optimal balance of training to meet the objectives of the Agency's mission and give consideration to employees' time and other organizational costs. With that balance in mind, Bureaus/Offices sponsoring new mandatory training are expected to identify potential offsets for reduced mandatory training (in terms of total number of employee training hours expended). Mandatory training that is effectively and efficiently implemented will enable the Department to strengthen performance, engagement and build overall workforce capabilities, while meeting training objectives mandated within Federal statute or regulation, and policies.

Mandatory training is part of a robust learning ecosystem within DOI. The assignment of mandatory training is a deliberate decision that augments other organizational activities to foster continuous learning, a performance culture and create awareness of compliance requirements. Mandatory training will not be used as a "catch all" or substitute when other workforce management practices would prove more effective.

Mandatory training must have a direct regulatory, legal, or policy compliance nexus (e.g. DOI Manual, Code of Federal Regulations or Executive Order, etc.) or determined as essential to employee safety and/or mitigate organizational risks identified by senior leadership. This policy doesn't preclude managers/supervisors at local offices or sites from assigning training to their employees that is needed to ensure a safe and highly skilled and capable workforce.

- 4. Approving Mandatory Training.** All mandatory training assigned at the Department-level or to employees within the Office of the Secretary (OS) will be requested through the DOI Chief Learning Officer (CLO) and Chief Human Capital Officer (CHCO) for approval by the Assistant Secretary, Policy, Management and Budget (AS-PMB) or their designee. Bureaus will establish a procedure ensuring all mandatory training assigned by bureaus are coordinated with the bureau's senior training director and human capital officer (HCO) for approval by the appropriate Assistant Secretary (or their designee, but no lower than bureau deputy director).

Requests for implementation of mandatory training will include the information identified in *Attachment A*. The CLO (in the case of Department-level training) and Bureau Training

Directors (in the case of Bureau directed mandatory training) are responsible for maintaining requests, disposition of requests and supporting documentation.

Bureaus will establish and maintain transparency by listing all required bureau mandated training via a website, to which all employees have access. Information will include course title, learning objective, authority, date training must be completed, target audience required to complete training and any known courses that provide reciprocity.

DOI and Federally mandated training is listed on the [DOI Mandatory Training Website](#).

Note: Bureaus/offices will ensure mandatory training is reasonably established and avoid excessive mandated training. All mandated training must have a business justification, which prioritizes the mandated training as a requirement for the safety and efficacy of the workforce or to meet agency compliance requirements.

5. **Development, Design and Implementation.** Mandatory training, existing and proposed, will be evaluated to ensure the training (see *Attachment C* for additional considerations):
 - a. Is required by regulation, statute, policy or other directives **or** is identified by senior leadership as needed to address an Agency or bureau risk; and
 - b. Is delivered using a methodology that meets the stated training requirements/objectives and minimizes impact on time available for mission related work activities; and
 - c. Is designed to maximize desired behavioral and performance outcomes using instructional design methods; and
 - d. Is developed for the appropriate audience that requires the specific training, technically accurate, focused on the training requirement, and limits the non-missional critical content; and
 - e. Is Section 508 compliant; and
 - f. Is designed and formatted using appropriate technical standards and is functional within the Department's Talent Management System; and
 - g. Is reviewed for consistency with applicable internal (e.g. DM Chapters) or external (e.g. National Initiative for Cybersecurity Education Framework) guidance, where applicable.

All mandatory training for employees will be assigned within **DOI Talent**, the DOI's Talent Management System (TMS), to the appropriate audience. Mandatory training will be provisioned within **DOI Talent** and assigned only after the training is reviewed by the appropriate training director and approved by the appropriate approving official, as identified in paragraph 4. Government-wide or DOI mandated training will only be assigned in **DOI Talent** by the Learning Management System (LMS) program manager. Bureaus will establish a process to ensure all approved bureau-level mandatory training is provisioned and assigned within **DOI Talent** by their LMS program managers or training directors.

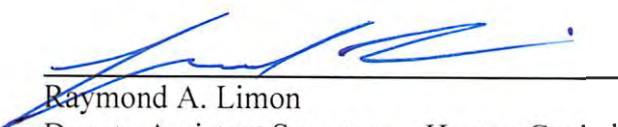
Note: All training provided via on-line or computer based training must be tested for functionality within the TMS prior to hosting and assignment within **DOI Talent**.

6. Reciprocity. The goal of mandatory training is to ensure employees are informed, aware, understand and are able to demonstrate necessary knowledge, compliance requirements, skills and/or behaviors. Training reciprocity allows training provided at one location, bureau, agency (federal, state or local) or other entity to be accepted at another location, bureau or agency. Reciprocity promotes efficiency and avoids requiring duplicative training and unnecessary expense or lost time.

- Supervisors may provide reciprocity and annotate completion within DOI Talent for training requirements generated at the local.
- Bureaus will implement, no later than **September 15, 2019**, an internal process for considering requests for training credit under reciprocity for all bureau-level (or below) mandated training. The approval authority for the process will not be any lower than that of bureau management official responsible for bureau-wide training and development. However, bureaus may delegate the authority to approve individual instances of reciprocity to lower levels of the organization.

The DOI CLO is the approval authority for training reciprocity for all OS employees and for all credit requests for government-wide or Department-level mandated training. All OS employees/supervisors seeking reciprocity for mandatory training will submit a request to the DOI CLO, Office of Strategic Employee and Organization Development, with the information outlined on *Attachment B*. The request must be signed by the employee and the supervisor.

- 7. Evaluating and Reporting.** Each bureau/office establishing and/or responsible for mandatory training will review such training and provide an initial report with the below information to the DOI's CLO no later than **September 30, 2019** and January 5th of each year, thereafter. The report will be signed by the Bureau-level training director/officer. The DOI CLO is responsible for the review of Department-level mandated training.
- a. Cover memorandum (signed by Training Director/Officer) certifying mandatory training has been reviewed and established as a requirement based upon organizational risk, employee safety, and/or compliance requirements. Also, certifying that a process for providing training reciprocity is established and guidance for requesting reciprocity is communicated on a mandatory training website; and
 - b. List of all bureau-level mandated training, including course title, target audience and size of population, date training implemented, date training updated, authority/reason for training, and point of contact accountable for training requirement; and
 - c. Web address for mandatory training website.
- 8.** Bureau human capital officers and training directors may contact the DOI's Deputy Chief Human Capital Officer or Chief Learning Officer with questions. Bureau/office employees should contact their training offices if they have questions.



Raymond A. Limon
Deputy Assistant Secretary – Human Capital
and Diversity
Chief Human Capital Officer

Attachments

Attachment A: Request Mandatory Training

Attachment B: Training Reciprocity Request

Attachment C: Mandatory Training Development Checklist/Considerations

Attachment A

Requesting Mandatory Training

Directorates/Offices requesting mandatory training must provide the information on the below form to the appropriate training officer. OS offices will submit requests to the CLO, Office of Strategic Employee and Organization Development. Bureaus may use this form for their approval processes. **All Requests must include Parts 1 & 2.**

Part 1 - General Course Information – All requests must include this information.			
Course information			
Course Title			
Date request submitted		<input type="checkbox"/> New Request <input type="checkbox"/> Resubmission <input type="checkbox"/> Content Revision or Update	
Sponsoring Office			
Point-of-Contact (POC)			
POC Contact Information	Email:	Phone:	
Course Description			
Course purpose, learning objectives and general description	(What essential knowledge or skills will be gained from this experience? How will it contribute to agency or employee’s ability to perform? What material will be covered in the course?)		
Course Delivery			
<input type="checkbox"/> Online Course* <input type="checkbox"/> Classroom Course <input type="checkbox"/> Blended/Classroom-Online <input type="checkbox"/> Other:			
*All e-learning courses must be accompanied by an alternative text format and documentation to certify Section 508			
Proposed Delivery Date(s):		Annual Completion Deadline:	
Duration:	Hour(s):	Minutes:	Frequency of Offering: <input type="checkbox"/> Annually <input type="checkbox"/> Biennially <input type="checkbox"/> Other:
Intended audience:	<input type="checkbox"/> New Employees		<input type="checkbox"/> All DOI Employees
	<input type="checkbox"/> Contractors		<input type="checkbox"/> Grantees/SEEs
Estimated number of people in targeted audience:			
Associated Costs (estimated)			
Development Costs:	Internal (i.e., FTE of Subject Matter Experts, staff reviewers, content creators)		\$
	Contractor		\$
Delivery Costs:	Instructor-Led or Online Delivery (circle one)		\$
Human Capital Costs:	Hours of engagement x # of employees x \$67 (average hourly rate)		\$
Total Cost			\$

Part 2 – Request for Approval to Proceed With a New Mandatory Course

Course Justification

Describe why this course should be approved as mandatory for all specified employees:

· Regulatory/Statutory · Agency deficiency identified by OIG or other federal entity · Other:

Justification/Requirement (Cite code, statute or EO if applicable):

Management Level Sponsor Concurrence

I, as the management official responsible for oversight of the stated training requirement, request that this course be approved and added to the list of mandatory training.

Name	Title	Signature	Date

Chief Learning Officer Recommendation (Bureau-Level Training Director/Officer for bureau mandated training)

Recommend Approval?	Chief Learning Officer (or appropriate bureau-level training director)	Signature	Date
· Yes · No			

· Yes/w Revisions (see comments below)

Comments:

DAS - HCD Approval

Approved?	Name	Signature	Date
· Yes · No			

Part 3 – Distribution of Mandatory Training Course – A full review of the course must be completed by subject matter experts, training officer/coordinator and Chief Learning Officer (or bureau Training Director, as appropriate) prior to distribution to agency (bureau) employees.

Attach a plan to provide reasonable accommodations under Section 508 requirements.

Course Materials

Please include a link to and/or attach a copy of the course materials.

Panel Review (Comprised of SME, Training/ISD Specialist, LMS Program Manager, CLO/ Training Director)

The following panelists have reviewed and concur that the course is/meets:

Technically accurate	· Yes · No	Statutory and regulatory requirements	· Yes · No
Appropriately designed	· Yes · No	Contractual and policy requirements	· Yes · No
Effective for course objectives	· Yes · No	508 compliance	· Yes · No
Name	Signature	Panelist	Date
		Technical SME	
		Training Specialist/ Instructional Systems Design Specialist	
		LMS Program Manager	
		CLO/Training Director	

Management Level Sponsor Concurrence (Accountable for Training Requirement)

I have reviewed and approved the content of this course.

Name	Title	Signature	Date
Comments:			

For Agency Use

Provide date the training was implemented in the TMS and any information pertaining to timing and/or implementation:

Comments:			
Name	Title	Signature	Date

Attachment B

Training Reciprocity Request

Employees requesting reciprocity for training completed at an organization other than current organization requiring mandatory training must submit the following information to the appropriate Training Director/Officer, or other official as designated in bureau guidance, for their office. Office of the Secretary employees must submit requests to the Office, Strategic Employee and Organizational Development, Attn: Chief Learning Officer.

Requests must include a cover memorandum, signed by employee and supervisor, stating the specific course the employee is requesting reciprocity in lieu of completing. The following information is required:

- Name of course seeking waiver (reciprocity) of completion; and
- Link to course in DOI Talent or copy of course description with learning objectives of course for which requesting waiver of completion; and
- Period of reciprocity requested (must be current requirement, e.g. FY2019 Annual Training Requirement); and
- Name of course, course length, training provider, mode of completion (e.g. classroom, online), and location of training seeking to use as equivalent training; and
- Copy of course description (including learning objectives); and
- Course completion certificate or transcript.

Additional Guidance for Approval Authorities:

Responding to Requests:

- Approval or Disapproval of request will be provided to the employee, with a courtesy copy to employee's supervisor, in writing within 10 calendar days of request;
- Approval/Disapproval responses will address the reasoning for the action, including whether the training is approved/disapprove in totality or partially;
- Responses will include instructions on appealing the decision.

Considerations (not all inclusive):

- Does a certification, previous training or other education provide the fundamental learning objectives of the mandatory training?
- Can on-the-job training/experience enhance previous training to meet mandatory training expectations/outcomes?
- Engage with mandatory training sponsors for their input.

NOTE: Reciprocity will only be granted satisfy current requirements and for courses completed within the same requirement period (e.g. if the training requirement is each fiscal year, the equivalent training must have been completed in the current fiscal year).

Attachment C

Mandatory Training Development Checklist/Considerations

	YES	NO
Is the course requirement mandated by regulation/executive order (if no, provide cite for all employee training requirement)		
COURSE DELIVERY:		
Does the government-wide or agency policy direct that a specific course be used to meet the training requirement?		
<ul style="list-style-type: none"> • Does DOI or a bureau currently offer a course(s) similar to the proposed course? • If yes, could the course be used to meet the requirement? • Could the course be revised to shorten development time? 		
Is the training delivery method aligned with the training requirement?		
Could a job aid, desk reference, handbook or best practices guide meet the requirement instead of an online or classroom course?		
Is a training duration specified in the requirement?		
If a recurring requirement, is the scope and duration the same as the original requirement? <ul style="list-style-type: none"> • Will employees re-take the original course? • Could alternatives be offered to reduce redundant content? • Will employees be given an option to “test out” of the recurring training (i.e., “go to test” option, training reviews, reading memorandums, or other documents) <ul style="list-style-type: none"> • If no, is testing out specifically prohibited by the requirement? 		
COURSE DESIGN:		
Is the course length suitable to the subject matter/to meet the training objective?		
Online Training		
If this is an online course, does it include clear instructions for navigation and overall course structure? <ul style="list-style-type: none"> • Has a method been provided that permits users to skip repetitive navigation links? • Are navigation functions executable from a keyboard as well as mouse clicks? • When a timed response is required, is the user alerted and given sufficient time to indicate more time is required? 		
Are all course objectives clearly stated?		
Do the modules follow a logical sequence?		
Does each module/lesson address one or more stated objectives?		
Classroom Training		
If this is a classroom course, does it include detailed information about how to teach the course? <ul style="list-style-type: none"> • Are the objectives of the curriculum defined? • Is the title appropriate? • Is an outline of the key skills and information needed to achieve the main course objective provided? 		

<ul style="list-style-type: none"> • Is the teaching approach (lecture, written materials, discussion sessions, hands-on practice) defined? • Have the required assessment components (practice tests, class discussions, essays, one-on-one meetings) been described? • Have standards (passing rate statistics, student attendance and participation patterns, and participant engagement trends) for course completions and evaluation been provided? 		
COURSE CONTENT:		
Does the course include multiple opportunities for student interactivity? (<i>Adults learn best by doing and practice, practice, practice; building upon basics, using exercises to recognize critical information in familiar scenarios, and receiving information through multiple sensory channels.</i>)		
Is all course content:		
<ul style="list-style-type: none"> • Free from typographical errors? • Easy to read for all users; regardless of their ability to see colors? (The font style, size and color are consistent throughout all media.) • Designed so that all information conveyed with color is also available without color? • Available in a variety of accessible formats (braille, reader-compatible, large print, low vision, closed captioned) without delay? 		
In online courses, do links to external and internal sources, websites and references work as expected?		
Is link behavior consistent throughout the online course? <ul style="list-style-type: none"> • Has it been confirmed that all links open in a new browser window? 		
GRAPHICS:		
Do all graphics/images:		
<ul style="list-style-type: none"> • Support the content and add instructional value? • Include a text equivalent for every non-text element (e.g., via “alt”, “longdesc”, or in element content)? • Have equivalent alternatives for any multimedia presentation synchronized with the presentation? 		
Do animations, if applicable, convey meaning and contribute to the user’s understanding of the content?		
Are animations visually described to comply with Section 508?		